



**LOCKS LAW FIRM, PLLC**

800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022  
T 212.838.3333  
T 866.LOCKSLAW  
F 212.838.3735  
www.lockslaw.com

May 23, 2016

**VIA ECF**

Hon. James L. Garrity  
United States Bankruptcy Court  
Southern District of New York  
Courtroom 601  
One Bowling Green  
New York, NY 10004-1408

**Re: In re: Chemtura Corporation, et al., Chapter 11, Case No. 09-11233 (JLG)**  
*Mark Lee, Executor for the Estate of Jack Edgar Lee v. United States Steel Corp. et al.*, Court of Common Pleas of Philadelphia County, Case No. 150402504;  
*Paul Simmons and Donna Simmons v. United States Steel Corp., et al.*, Court of Common Pleas of Philadelphia County, Case No. 150804219;  
*Pamela Rapoza v. Sunoco, Inc. (R&M) et al.*, Court of Common Pleas of Philadelphia County Case No. 150901555;  
*Robert Whited and Janice Whited v. United States Steel Corp. et al.*, Court of Common Pleas of Philadelphia County Case No. 15110433;  
*Bruce Rhyne and Janice Rhyne v. United States Steel Corp. et al.*, Court of Common Pleas of Philadelphia County Case No. 160100228.

Dear Judge Garrity:

We represent the above referenced Claimants in relation to Chemtura Corporation's Motion to Enforce Discharge Injunction filed on April 18, 2016 in that above matter (Dkt. No. 5873). In Claimant's opposition papers, filed on May 18, 2016 (Dkt. No. 5884), we reference the above five lawsuits filed against Chemtura and/or its predecessors Witco Corporation, Witco Distributors, Inc. and Kendall Refining Company. In preparing for a Case Management Conference in another matter scheduled for today, my partner, Andrew DuPont (*pro hac vice* admission pending, Dkt. No. 5883) was reminded that Witco Corporation, Witco Distributors, Inc. and Kendall Refining Company, but not Chemtura, were named as Defendants in a sixth lawsuit filed by this office, *James Jones and Franco Jones vs. Sunoco, Inc., et al.* Court of Common Pleas of Philadelphia County, February Term, 2016 No. 04098.

We are writing to advise the Court of the existence of this lawsuit as it was not part of the motions and objection filed in this matter. We are still in the process of securing service of process in the *Jones* case. Since this case is in the very early stages, it was overlooked when we filed our objection. We apologize for this oversight.

Hon. James L. Garrity  
May 23, 2016  
Page 2

Respectfully submitted,

LOCKS LAW FIRM PLLC

By: /s/ Janet Walsh  
JANET WALSH, ESQUIRE